

Exhibit 308

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF ALABAMA
3 SOUTHERN DIVISION
4

5 IN RE: BLUE CROSS BLUE SHIELD
6 Master File No. 2:13-CV-20000-RDP
7 ANTITRUST LITIGATION
8 MDL NO. 2406
9

10
11 VIDEO DEPOSITION OF GEORGE TICKLE
12 Balch & Bingham
13 1901 Sixth Avenue North, Suite 1500
14 Birmingham, Alabama 35203
15 February 15, 2017
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20 REPORTED BY: Lane C. Butler
21 Certified Realtime Reporter,
22 Registered Professional
23 Reporter and Notary Public
24
25

1 Q. Okay, sir. We're going to go through
2 a bit of the history of the premiums and whether
3 they've gone up or down in just a few minutes. But
4 generally, I just wanted to ask you right now have
5 y'all ever, at any point in time during you've been
6 responsible for HR, been quoted by any insurers
7 other than Blue Cross and Blue Shield of Alabama?

8 A. I don't believe anybody has ever
9 quoted us rates.

10 Q. Okay. They tried to quote you rates?

11 A. Yes.

12 Q. Okay, sir. Who has tried to quote
13 you rates?

14 A. UnitedHealthcare. And I'm sure
15 there's someone else like that --

16 Q. Okay.

17 A. -- that probably has.

18 Q. Are there other -- whether they've
19 attempted to quote you or not, are you aware of
20 other health insurers operating?

21 A. Yes.

22 MR. BROWN: Object to the form.

23 Q. In the state?

24 A. Yes.

25 MR. BROWN: Object to the form.

1 Q. Other than UnitedHealthcare?

2 A. Yes.

3 Q. What other companies are you aware
4 of?

5 A. I don't remember their names. I know
6 there is other providers similar to
7 UnitedHealthcare.

8 Q. All right, sir. Is Viva --

9 A. Yes.

10 Q. -- one of those? What about Cigna?

11 A. I've heard of them, yes.

12 Q. Okay. What about Aetna?

13 A. Yes.

14 Q. What about Southeast Health Plan?

15 MR. BROWN: Object to the form.

16 Q. Have you heard of them anytime during
17 the period of time you've been responsible for HR?

18 A. Not that I'm aware of.

19 Q. All right, sir. But other than -- of
20 these, though, only United has attempted to write a
21 quote for you?

22 A. Yes.

23 Q. Okay.

24 A. To my knowledge.

25 Q. All right, sir. And when did that

1 occur?

2 A. Probably when they first entered the
3 marketplace.

4 Q. Okay. If you would, tell me what you
5 recall about that interaction.

6 A. It was mainly discussions as to their
7 coverage in the different areas of the state.

8 Q. Talking about the availability of
9 network providers?

10 A. Yes.

11 Q. Okay. What do you recall from that
12 discussion?

13 A. We're -- we actually have offices in
14 three states, Alabama, Florida, and Georgia. And
15 there -- in a city like Birmingham, there appeared
16 to be decent coverage. A lot of our employees live
17 out in rural areas, and there didn't seem to be as
18 good a coverage there. So we pretty much ended the
19 discussions at that point.

20 Q. All right, sir. Going back --
21 because we can use "coverage" to mean a lot of
22 different things. I think what we were just
23 talking about is the availability of healthcare
24 providers --

25 A. Yes.